

**Statement of the Honorable Steve Cohen for the Hearing on
“Examining Class Action Lawsuits Against Intermediate Care
Facilities for Individuals with Intellectual Disabilities (ICF/IID)”
Before the Subcommittee on the Constitution and Civil Justice**

**Tuesday, March 6, 2018 at 10:00 a.m.
2141 Rayburn House Office Building**

Today’s hearing on “Examining Class Action Lawsuits Against Intermediate Care Facilities for Individuals with Intellectual Disabilities” will understandably raise passionate feelings on both sides of the debate over whether class action lawsuits and other litigation to enforce the Americans with Disabilities Act result in the best outcomes for persons with intellectual disabilities.

Whatever one’s views about the particulars of this issue, I think we can all agree that the law must be applied in a way that ensures that persons with mental disabilities are given the best care appropriate to their circumstances and that they should be protected from harm, whether such harm results from deliberately abusive treatment or neglect.

Our discussion occurs against the backdrop of both a nearly two-generations-long movement towards trying to reduce reliance on institutional care for those with mental disabilities and, with the enactment of the Americans with Disabilities Act, a move towards ending unjustified segregation of people with disabilities and greater integration of such persons into the mainstream of American life.

As the Supreme Court made clear in its decision in *Olmstead v. L.C.*, a state violates Title II of the ADA, which prohibits disability discrimination in state and local government programs and services, if it institutionalizes a person with an intellectual disability in an intermediate care facility where such institutionalization is not medically necessary, the person does not object to being moved into a more integrated setting, and placement of such a person in a community setting can be reasonably accommodated in light of a state's resources and the medical needs of other mentally disabled persons.

One of the key mechanisms for ensuring that the ADA's integrative purpose is met is the use of litigation and, in particular, class actions, to enforce the ADA's public policy goals. The crux of the disagreement among our witnesses seems to be whether these class actions are faithful to the mandate outlined by the Court in *Olmstead*.

In opposing legislation introduced in previous Congresses that would have effectively curtailed the use of class actions, disability rights organizations argued that class actions were critical to stopping widespread abuse and neglect by institutions for individuals with disabilities and were key to achieving systemic enforcement of the right of people with disabilities to be served in the most integrated setting appropriate to their needs as mandated by *Olmstead*.

Some family members of persons with intellectual disabilities, on the other hand, believe that these class actions ultimately force states to close down institutions that serve the heightened health care needs of their loved ones and upset the balance struck in *Olmstead* between

integration and providing a necessary level of care for all persons with intellectual disabilities at every point on the spectrum of disability.

We ought to be wary of limiting the use of class actions given the many benefits of class actions in enforcing public policy. I have fought against legislative efforts to make it harder to pursue class actions in other contexts and generally view such efforts with deep skepticism.

That being said, the disagreement over whether to pursue *Olmstead* class actions or whether courts are properly applying *Olmstead* in these class actions is not one that we will likely resolve with today's Subcommittee hearing and, indeed, it is one that properly should be left to courts.

What the Subcommittee should focus its limited time and resources on are other matters of greater constitutional importance that we have so far ignored.

For example, I note that a few weeks ago, Special Counsel Robert Mueller indicted 13 Russians for their role in unlawfully interfering in the 2016 presidential election with the express aims of hurting Hillary Clinton and helping Donald Trump win election as president.

One of the clear messages from these indictments is that we must better protect the integrity of our voting system from cynical and harmful manipulation by foreign adversaries like Russia.

Make no mistake: Russia's actions constituted an attack on the United States in an attempt to sow chaos, disrupt our democracy, and undermine our government.

Our Committee should be playing a central role in examining Russia's conduct and in crafting ways to better protect the integrity of our voting system and our democracy from foreign attack. Our priority must be to stand up for America and for our way of life when it is under threat.

Subcommittee on the Constitution and Civil Justice

“Examining Class Action Lawsuits against Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICFs/IID)”

Letters submitted for the record:

American Association of People with Disabilities, 5 March 2018

American Civil Liberties Union, 5 March 2018

Autism Society, 5 March 2018

Autistic Self Advocacy Network, 5 March 2018

Consortium for Citizens with Disabilities, 5 March 2018

Disability Rights Education & Defense Fund, 5 March 2018

Epilepsy foundation, 5 March 2018



March 5, 2018

Hon. Bob Goodlatte
Chair, Committee on the Judiciary
2309 Rayburn House Office Building
U.S. House of Representatives
Washington DC 20515

Hon. Jerrold Nadler
Ranking Member, Committee on Judiciary
2109 Rayburn House Office Building
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Washington DC 20515

Hon. Steve King
Chair, Subcommittee on the Constitution
and Civil Justice
Committee on the Judiciary
2210 Rayburn House Office Building
U.S. House of Representatives
Washington DC 20515

Hon. Steve Cohen
Ranking Member, Subcommittee on the
Constitution and Civil Justice
Committee on the Judiciary
2404 Rayburn House Office Building
U.S. House of Representatives
Washington DC 20515

*Re: Hearing on "Examining Class Action Suits Against
Intermediate Care Facilities for People with Intellectual Disabilities"*

Dear Chairman Goodlatte, Ranking Member Nadler, Chairman King and Ranking Member Cohen:

The American Association of People with Disabilities submits this letter to express our strong opposition to any legislation that would weaken the ability to bring class action lawsuits to enforce the rights of individuals with intellectual and developmental disabilities in intermediate care facilities.

We have grave concerns about bills that were introduced in prior years aiming to restrict class action lawsuits to protect the rights of institutionalized individuals with intellectual and developmental disabilities. Such legislation, if passed, would do enormous damage. It would leave people with intellectual and developmental disabilities without adequate recourse to remedy harms such as abuse and neglect in institutional settings and the needless institutional confinement of individuals who could live in community settings and wish to do so.

Class action lawsuits have been a very important tool, and often the only effective means, to address abuse, neglect, and violations of the civil rights of institutionalized individuals with disabilities. They have been critical to systemic enforcement of the right of people with disabilities to be served in the most integrated setting appropriate to their needs. *Olmstead v. L.C.*, 527 U.S. 581 (1999). Many thousands of individuals with intellectual disabilities (as well as individuals with other disabilities) remain needlessly confined in public and private institutions.

The bills introduced in prior Congresses to limit class actions by institutionalized individuals with intellectual and developmental disabilities would have created different—and more restrictive—rules for

class actions brought by these individuals than for class actions brought by anyone else. This would be a dangerous and troubling precedent. There is no reason why individuals with intellectual disabilities should have greater obstacles to proceeding as a class than those imposed by Federal Rule 23, which applies to all class actions.

The bills introduced in prior Congresses claimed to provide protections for class members who do not wish to participate in a class action suit. But the existing rules for class actions already provide protections for these individuals and their representatives. Among other things, before a class action may be settled, the court must conduct a hearing to ensure that the settlement is fair, adequate and reasonable, and class members must have the opportunity to object and be heard. Individuals and their family members have the opportunity to offer testimony and/or submit written comments expressing their objections to a proposed settlement. When objectors have demonstrated that a proposed settlement is not fair, adequate and reasonable, courts have declined to approve such settlements. Individuals with intellectual and developmental disabilities and their families have also been permitted to intervene in class action cases where appropriate.

Moreover, in cases where individuals seek to enforce their rights under the ADA and *Olmstead* to leave institutions and live in community settings, class members who do not wish to live in a community setting cannot be forced to do so. Neither the ADA nor *Olmstead* forces accommodations on individuals who do not want them. Settlements and remedy orders in *Olmstead* cases make community services and housing available to class members who choose them, without forcing them on individuals who do not.

We urge you not to consider legislation that would change class action rules for institutionalized individuals with intellectual and developmental disabilities.

Sincerely yours,

A handwritten signature in dark ink, appearing to be a stylized 'M' followed by a long horizontal stroke.

President & CEO



March 5, 2018

Rep. Steven King
Chairman
House Judiciary Committee
Subcommittee on the
Constitution and Civil Justice
H2-362 Ford H.O.B.
Washington, D.C. 20002

Rep. Stephen Cohen
Ranking Member
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ANTHONY D. ROMERO
EXECUTIVE DIRECTOR

ROBERT REMAR
TREASURER

Dear Chairman King and Ranking Member Cohen:

On behalf of the American Civil Liberties Union (ACLU) and our nearly two million members and supporters, we write regarding the upcoming House Judiciary Committee Subcommittee on the Constitution and Civil Justice hearing on *Examining Class Action Lawsuits Against Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICF/IID)*.

The ACLU strongly believes that people with intellectual and developmental disabilities (I/DD) deserve equal access to community integration and the autonomy, independence, and quality of life associated with life in the community. Over the course of our history, we have fought to establish, preserve, and expand access to home and community-based services as an alternative to the isolation and segregation of institutional life. One critical tool used by the ACLU and other disability rights advocates in support of that work is class-action litigation.

The ACLU will oppose any measure designed to make it more difficult for state Protection and Advocacy agencies or others to represent institutionalized individuals with I/DD in class-action lawsuits. Class-action suits have long been an important tool for disability rights advocates to protect the rights of people with disabilities who are housed in institutions. We are particularly concerned by any legislation that would create a different rule for class action lawsuits involving institutionalized people with disabilities than for class action lawsuits involving any other class. There are already federal rules governing class-action lawsuits, which are meant to apply to all classes. By establishing a tiered system, Congress would effectively discriminate against people with I/DD, who would have less access to the courts to seek justice as a class.

Class action litigation is particularly useful as a means of countering misinformation and reducing the risk of retaliation against institutional residents who choose to participate in a lawsuit to enforce their rights. If Congress were to create a special "opt-out" provision of class action lawsuits involving institutional residents, it would leave them vulnerable to coercion or intimidation from institutions seeking to influence them to opt out, or to inflict

retaliation if they choose not to opt out. This seems especially likely given that prior legislation on this topic required federally-funded entities to give advance notice of the lawsuit to the institutions, with the institutions' staff then having the responsibility of informing the residents or their legal guardians. Such an approach seems tailor-made to promote misinformation and inappropriate pressure on members of the class.

We urge you to avoid any actions that would infringe upon the class action rights of people with disabilities, including people with I/DD. Access to justice should not depend on a diagnosis, nor should the opportunity to fully experience the benefits of community life.

If you have any questions, please contact Vania Leveille at vleveille@aclu.org.

Sincerely,



Faiz Shakir
Director



Vania Leveille
Senior Legislative Counsel

cc: Honorable Bob Goodlatte, Chair, House Judiciary Committee
Honorable Jerrold Nadler, Ranking Member, House Judiciary Committee

March 5, 2018

Hon. Bob Goodlatte
Chair, Committee on the Judiciary
2309 Rayburn House Office Building
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Dear Chairman Goodlatte, Ranking Member Nadler, Chairman King and Ranking Member Cohen:

The Autism Society of America is writing to express concerns about a hearing on "Examining Class Action Suits Against Intermediate Care Facilities for People with Intellectual Disabilities" scheduled to take place tomorrow, March 6, 2018.

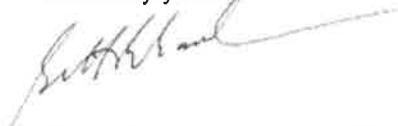
The Autism Society is a national organization representing approximately 100 affiliates nationwide that support and serve people with autism and their families.

We are opposed to any legislation that would weaken the ability to bring class action lawsuits to enforce the rights of individuals with intellectual and developmental disabilities in intermediate care facilities.

There have been bills introduced in previous Congresses to restrict class action lawsuits to protect the rights of institutionalized individuals with intellectual and developmental disabilities. If passed, these bills would leave people with autism and other developmental disabilities without adequate recourse to remedy harms such as abuse and neglect. Class action lawsuits have been a very important tool to address abuse, neglect, and violations of the civil rights of institutionalized individuals with disabilities. They have been critical to systemic enforcement of the right of people with disabilities to be served in the most integrated setting appropriate to their needs (see *Olmstead v. L.C.*, 527 U.S. 581 (1999)).

Thank you for holding hearings to gather facts. However, we urge you not to consider legislation that would weaken class action protections for individuals with developmental disabilities residing in institutions.

Sincerely yours,



Executive Director and CEO
Autism Society



Nothing about us without us!

March 5, 2018

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U.S. House of Representatives
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Re: Hearing on "Examining Class Action Suits Against Intermediate Care Facilities for People with Intellectual Disabilities"

Dear Chairman Goodlatte, Ranking Member Nadler, Chairman King and Ranking Member Cohen:

The Autistic Self Advocacy Network submits this letter to express our strong opposition to any legislation that would weaken the ability to bring class action lawsuits to enforce the rights of individuals with intellectual and developmental disabilities in intermediate care facilities.

We have grave concerns about bills that were introduced in prior years aiming to restrict class action lawsuits to protect the rights of institutionalized individuals with intellectual and developmental disabilities. Such legislation, if passed, would do enormous damage. It would leave people with intellectual and developmental disabilities without adequate recourse to remedy systemic harms such as abuse and neglect in institutional settings and the needless institutional confinement of individuals who could live in community settings and wish to do so.

Class action lawsuits have been a very important tool, and often the only effective means, to address abuse, neglect, and violations of the civil rights of institutionalized individuals with disabilities. They have been critical to systemic enforcement of the right of people with disabilities to be served in the most integrated setting appropriate to their needs. *Olmstead v. L.C.*, 527 U.S. 581 (1999). Many thousands of individuals with intellectual disabilities (as well as individuals with other disabilities) remain needlessly confined in public and private institutions.

The bills introduced in prior Congresses to limit class actions by institutionalized individuals with intellectual and developmental disabilities would have created different—and more restrictive—rules for class actions brought by these individuals than for class actions brought by anyone else. This would be a dangerous and troubling precedent. There is no reason why individuals with intellectual disabilities should have greater obstacles to proceeding as a class than those imposed by Federal Rule 23, which applies to all class actions.

The bills introduced in prior Congresses claimed to provide protections for class members who do not wish to participate in a class action suit. But the existing rules for class actions already provide protections for these individuals and their representatives. Among other things, before a class action may be settled, the court must conduct a hearing to ensure that the settlement is fair, adequate and reasonable, and class members must have the opportunity to object and be heard. Individuals and their family members have the opportunity to offer testimony and/or submit written comments expressing their objections to a proposed settlement. When objectors have demonstrated that a proposed settlement is not fair, adequate and reasonable, courts have declined to approve such settlements. Individuals with intellectual and developmental disabilities and their families have also been permitted to intervene in class action cases where appropriate.

Moreover, in cases where individuals seek to enforce their rights under the ADA and *Olmstead* to leave institutions and live in community settings, class members who do not wish to live in a community setting cannot be forced to do so. Neither the ADA nor *Olmstead* forces accommodations on individuals who do not want them. Settlements and remedy orders in *Olmstead* cases make community services and housing available to class members who choose them, without forcing them on individuals who do not.

We urge you not to consider legislation that would change class action rules for institutionalized individuals with intellectual and developmental disabilities.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'Sam Crane', with a stylized, cursive script.

Sam Crane, Legal Director
Autistic Self Advocacy Network



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

March 5, 2018

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*Re: Hearing on "Examining Class Action Suits Against
Intermediate Care Facilities for People with
Intellectual Disabilities"*

Dear Chairman Goodlatte, Ranking Member Nadler, Chairman King and Ranking Member Cohen:

The Rights Task Force of the Consortium for Citizens with Disabilities (CCD) submits this letter to express our strong opposition to any legislation that would weaken the ability to bring class action lawsuits to enforce the rights of individuals with intellectual and developmental disabilities in intermediate care facilities. CCD is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. CCD represents individuals with disabilities, family members, and professionals in the disability field.

We note the widespread opposition among disability rights organizations to bills introduced in prior years aiming to restrict class action lawsuits to protect the rights of institutionalized individuals with intellectual and developmental disabilities. Such legislation, if passed, would do enormous damage. It would leave people with intellectual and developmental disabilities

without adequate recourse to remedy harms such as abuse and neglect in institutional settings and the needless institutional confinement of individuals who could live in community settings and wish to do so.

Class action lawsuits have been a critical tool to stop shameful widespread abuse, neglect, and violations of the civil rights of institutionalized individuals with disabilities. Such lawsuits brought about systemic change to address horrific institutional conditions in cases such as the *Willowbrook* case in New York, the *Wyatt* case in Alabama, the *Pennhurst* case in Pennsylvania, and numerous others. Even now, systemic failures occur in institutional settings, placing people with disabilities at great risk of harm.

In addition to remedying abuse and neglect, class action lawsuits are often the only effective way to achieve systemic enforcement of the right of people with disabilities to be served in the most integrated setting appropriate to their needs. *Olmstead v. L.C.*, 527 U.S. 581 (1999).¹ Many thousands of individuals with intellectual disabilities (as well as individuals with other disabilities) remain needlessly confined in public and private institutions. Class action litigation has been a key driver of large-scale efforts to offer institutionalized people with intellectual disabilities the opportunity to live in community settings with appropriate services.

The bills introduced in prior Congresses to limit class actions by institutionalized individuals with intellectual and developmental disabilities would have created different—and more restrictive—rules for class actions brought by these individuals than for class actions brought by anyone else. This would be a dangerous and troubling precedent. The Federal Rules of Civil Procedure, promulgated by the United States Supreme Court, set forth uniform rules for federal court actions, including class action lawsuits. These rules ensure fairness by applying the same standards and procedures to all litigants in federal court. There is no reason why individuals with intellectual disabilities should have greater obstacles to proceeding as a class than those imposed by Federal Rule 23, which applies to all class actions.

The bills introduced in prior Congresses claimed to provide protections for class members who do not wish to participate in a class action suit. But the existing rules for class actions already provide protections for these individuals and their representatives. Federal Rule of Civil Procedure 23 provides a host of procedural protections to ensure that the interests of all class members are fairly and adequately represented. Among other things, Rule 23 requires that, before a class action may be settled, the court must conduct a hearing to ensure that the settlement is fair, adequate and reasonable, and class members must have the opportunity to object and be heard. Objectors routinely offer testimony and/or submit written comments expressing their objections to a proposed settlement. When objectors have demonstrated that a proposed settlement is not fair, adequate and reasonable, courts have declined to approve such

¹ Enforcement by the Justice Department in both areas has also been tremendously important. The Department does not have the resources to take enforcement action in every situation where the rights of institutionalized people with intellectual and developmental disabilities are violated, however, so private enforcement through class actions is also critical.

settlements. Individuals with intellectual and developmental disabilities and their families have also been permitted to intervene in class action cases where appropriate.

Moreover, in cases where individuals seek to enforce their rights under the ADA and *Olmstead* to leave institutions and live in community settings, class members who do not wish to live in a community setting cannot be forced to do so. Neither the ADA nor *Olmstead* forces accommodations on individuals who do not want them. Settlements and remedy orders in *Olmstead* cases make community services and housing available to class members who choose them, without forcing them on individuals who do not.

We urge you not to consider legislation that would change class action rules for institutionalized individuals with intellectual and developmental disabilities.

Sincerely yours,

CCD Rights Co-Chairs
On behalf of CCD Rights Task Force



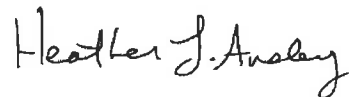
Jennifer Mathis
Bazelon Center for Mental Health Law



Dara Baldwin
National Disability Rights Network



Mark Richert
American Foundation for the Blind



Heather Ansley
Paralyzed Veterans of America



Samantha Crane
Autistic Self Advocacy Network

March 5, 2018

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Washington DC 20515

Re: Hearing on "Examining Class Action Suits Against Intermediate Care Facilities for People with Intellectual Disabilities"

Dear Chairman Goodlatte, Ranking Member Nadler, Chairman King and Ranking Member Cohen:

Disability Rights Education & Defense Fund submits this letter to express our strong opposition to any legislation that would weaken the ability to bring class action lawsuits to enforce the rights of individuals with intellectual and developmental disabilities in intermediate care facilities.

We have grave concerns about bills that were introduced in prior years aiming to restrict class action lawsuits to protect the rights of institutionalized individuals with intellectual and developmental disabilities. Such legislation, if passed, would do enormous damage. It would leave people with intellectual and developmental disabilities without adequate recourse to remedy harms such as abuse and neglect in institutional settings and the needless institutional confinement of individuals who could live in community settings and wish to do so.

Class action lawsuits have been a very important tool, and often the only effective means to address abuse, neglect, and violations of the civil rights of institutionalized individuals with disabilities. They have been critical to systemic enforcement of the right of people with disabilities to be served in the most integrated setting appropriate to their needs. *Olmstead v. L.C.*, 527 U.S. 581 (1999). For every one institutionalized individual fortunate enough to obtain legal representation, there are many more who because of circumstances or lack of resources will never get to a court. Class action lawsuits help to ensure that all disabled people who are institutionalized have representation so that they do not remain needlessly confined in public and private institutions.

Main Office: 3075 Adeline Street, Suite 210 • Berkeley, CA 94703 • 510.644.2555 • tty/fax 510.841.8645 • www.dredf.org

Washington DC: 800.348.4232

Doing disability justice

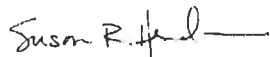
The bills introduced in prior Congresses to limit class actions by institutionalized individuals with intellectual and developmental disabilities would have created different—and more restrictive—rules for class actions brought by these individuals than for class actions brought by anyone else. This would be a dangerous and troubling precedent. There is no reason why individuals with intellectual disabilities should have greater obstacles to proceeding as a class than those imposed by Federal Rule 23, which applies to all class actions.

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We urge you not to consider legislation that would change class action rules for institutionalized individuals with intellectual and developmental disabilities.

Sincerely yours,



Susan Henderson &
Executive Director &



March 5, 2018

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Chair, Committee on the Judiciary
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*Re: Hearing on "Examining Class Action Suits Against
Intermediate Care Facilities for People with
Intellectual Disabilities"*

Dear Chairman Goodlatte, Ranking Member Nadler, Chairman King and Ranking Member Cohen:

The Epilepsy Foundation submits this letter to express our strong opposition to any legislation that would weaken the ability to bring class action lawsuits to enforce the rights of individuals with intellectual and developmental disabilities in intermediate care facilities.

The Epilepsy Foundation is the leading national voluntary health organization that speaks on behalf of the at least 3.4 million Americans with epilepsy and seizures. We foster the wellbeing of children and adults affected by seizures through research programs, educational activities, advocacy, and direct services. Epilepsy is a medical condition that produces seizures affecting a variety of mental and physical functions. Approximately 1 in 26 Americans will develop epilepsy at some point in their lifetime.

We have grave concerns about bills that were introduced in prior years aiming to restrict class action lawsuits to protect the rights of institutionalized individuals with intellectual and developmental disabilities. Such legislation, if passed, would do enormous damage. It would leave people with intellectual and developmental disabilities without adequate recourse to remedy harms such as abuse and neglect in institutional settings and the needless institutional confinement of individuals who could live in community settings and wish to do so.

Class action lawsuits have been a very important tool, and often the only effective means, to address abuse, neglect, and violations of the civil rights of institutionalized individuals with disabilities. They have been critical to systemic enforcement of the right of people with disabilities to be served in the most integrated setting appropriate to their needs. *Olmstead v. L.C.*, 527 U.S. 581 (1999). Many



thousands of individuals with intellectual disabilities (as well as individuals with other disabilities) remain needlessly confined in public and private institutions.

The bills introduced in prior Congresses to limit class actions by institutionalized individuals with intellectual and developmental disabilities would have created different—and more restrictive—rules for class actions brought by these individuals than for class actions brought by anyone else. This would be a dangerous and troubling precedent. There is no reason why individuals with intellectual disabilities should have greater obstacles to proceeding as a class than those imposed by Federal Rule 23, which applies to all class actions.

The bills introduced in prior Congresses claimed to provide protections for class members who do not wish to participate in a class action suit. But the existing rules for class actions already provide protections for these individuals and their representatives. Among other things, before a class action may be settled, the court must conduct a hearing to ensure that the settlement is fair, adequate and reasonable, and class members must have the opportunity to object and be heard. Individuals and their family members have the opportunity to offer testimony and/or submit written comments expressing their objections to a proposed settlement. When objectors have demonstrated that a proposed settlement is not fair, adequate and reasonable, courts have declined to approve such settlements. Individuals with intellectual and developmental disabilities and their families have also been permitted to intervene in class action cases where appropriate.

Moreover, in cases where individuals seek to enforce their rights under the ADA and *Olmstead* to leave institutions and live in community settings, class members who do not wish to live in a community setting cannot be forced to do so. Neither the ADA nor *Olmstead* forces accommodations on individuals who do not want them. Settlements and remedy orders in *Olmstead* cases make community services and housing available to class members who choose them, without forcing them on individuals who do not.

We urge you not to consider legislation that would change class action rules for institutionalized individuals with intellectual and developmental disabilities.

Please do not hesitate to contact Angela Ostrom, Chief Legal Officer & Vice President Public Policy, at 301-918-3766 or aostrom@efa.org with any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Philip M. Gattone".

Philip M. Gattone, M.Ed.
President & CEO
Epilepsy Foundation